

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In re

Refreshing USA, LLC,

Debtors<sup>1</sup>.

Chapter 11

Case No. 24-33919 (ARP)  
(Jointly Administered)

**DEBTORS' WITNESS AND EXHIBIT LIST FOR VIRTUAL HEARING ON  
NOVEMBER 12, AT 6:00 P.M. (PREVAILING CENTRAL TIME)**

The above-captioned debtors and debtors-in-possession Refreshing USA, LLC, Water Station Management LLC, and Creative Technologies, LLC (collectively, "Debtors") file this Witness and Exhibit List for the *virtual hearing* in the jointly administered Case No. 24-33919 to be held on **November 12, 2024, at 6:00 p.m. (prevailing Central Time)** (the "Hearing") before the Honorable Judge Alfredo R. Pérez.

**WITNESSES**

Debtors may call any of the following witnesses at the hearing, whether in person or by proffer:

1. Eric Camm, Principal and Director of Capital Advisory for Turning Point Strategic Advisor;
2. Joseph Fanelli, Chief Restructuring Officer of Ideal Property Investments, LLC, a

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<sup>1</sup> Debtors and debtors-in-possession in these Chapter 11 cases ("Bankruptcy Case(s)"), along with the last four digits of their respective Employer Identification Numbers, are as follows: Refreshing USA, LLC (85-3358945) ("Refreshing"), Case No. 24-33919; Water Station Management LLC (81-1202716) ("Water Station"), Case No. 24-33924; and Creative Technologies, LLC (46-2581888) ("Creative" and, together with Refreshing and Water Station, "Debtors"), Case No. 24-33934. Debtors' mailing address is: 2732 Grand Ave., Ste. 122, Everett, WA 98201.

Chapter 11 debtor in possession in the Eastern District of Washington, Case No. 24-01421-FPC11;

3. Brian Weiss, Partner of Force Ten Partners, LLC;
4. Any witnesses listed or called by any other party;
5. Any witnesses necessary to establish that notice of hearing has been provided; and
6. Any witnesses necessary to rebut the testimony of any witnesses called or designated by any other parties.

**EXHIBITS**

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
A.	Declaration of Eric Camm in Support of Debtors' Motion to Transfer Venue Pursuant to 28 U.S.C. § 1412 and Federal Rule of Bankruptcy Procedure 1014(A) [Dkt #170-1]				
B.	Declaration of Brian Weiss in Support of Debtors' Motion to Transfer Venue Pursuant to 28 U.S.C. § 1412 and Federal Rule of Bankruptcy Procedure 1014(A) (Dkt #170-2]				
C.	Declaration of Joseph Fanelli in Support of Debtors' Motion to Transfer Venue Pursuant to 28 U.S.C. § 1412 and Federal Rule of Bankruptcy Procedure 1014(A) (Dkt #170-3]				
D.	Copy of Court Docket in USBC Eastern District of Washington, <i>In re Ideal Property Investments LLC</i> , Case No. 24-01421-FPC11				

**RESERVATION OF RIGHTS**

Debtors reserve their right to amend, supplement, or remove any exhibits prior to the Hearing. Debtors also reserve the right to use any exhibits presented by any other party and to ask the Court to take judicial notice of any document.

DATED: November 11, 2024.

Respectfully submitted,

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By /s/ Danny Newman

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